

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SARAH FARROW,

Plaintiff,

vs.

CIVIL ACTION NO. 20-CV-04326

PARAMOUNT RECOVERY SYSTEMS.,

Defendant.

**JOINT MOTION FOR ENTRY OF CONFIDENTIALITY AND PROTECTIVE
ORDER**

The Parties file this Joint Motion for Entry of a Confidentiality and Protective Order. The Parties agree that the documents and information relevant to the claims and defenses in this matter may include trade secrets, confidential research development, technology, or other proprietary information belonging to a third-party's, defendant's and/or the plaintiff's personal income, credit and other confidential information. As a result, to protect the use, handling and disclosure of any such information that is produced in this matter, the Parties request that the Court enter the Stipulated Protective Order attached hereto as Exhibit "A." All Parties agree to the form and substance of the Stipulated Protective Order attached hereto as Exhibit "A," as evidenced by the signature below.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request the Court grant this Motion, and entre the Protective Order attached as Exhibit "A."

AGREED:

For SARAH FARROW

By: /s/ Jody Burton

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**FOR PARAMOUNT RECOVERY
SYSTEMS.**

By: /s/ Keith Wier

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of June, 2021, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following

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